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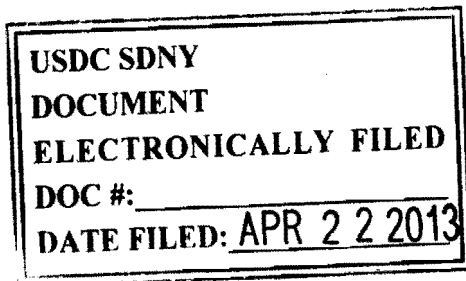
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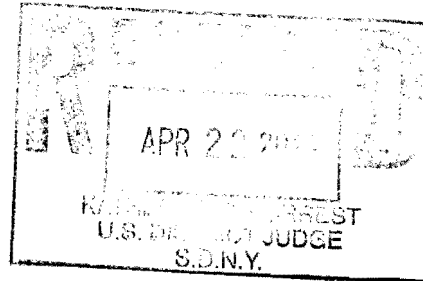
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\*NOT ADMITTED TO THE NEW YORK BAR



**Via Hand Delivery**

Hon. Katherine B. Forrest  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Hawkins v. National Football League, et al.*, No. 13-cv-01067 (KBF)  
[re. 12 Civ. 6493]

Dear Judge Forrest:

We represent defendants the National Football League (the "NFL") and NFL Properties LLC (collectively, the "NFL Defendants") in the above-referenced matter. We write to request an agreed-upon 30-day extension to the NFL Defendants' deadline for answering, moving, or otherwise responding to Plaintiff's complaint. Plaintiff in this action consents to this request.

The background underlying this request is as follows. Plaintiff served a summons and the complaint on the NFL Defendants on January 17, 2013. The NFL Defendants removed the action to federal court on February 15, 2013, pursuant to 28 U.S.C. §§ 1367, 1441 and 1446, and pursuant to 28 U.S.C. § 1331 on the basis of federal question preemption. On April 8, 2013, the parties completed briefing on Plaintiff's motion to remand and the NFL Defendants' motion to

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stay proceedings, except for any preservation depositions, pending a transfer decision by the Judicial Panel on Multidistrict Litigation.<sup>1</sup>

The NFL Defendants' response to the complaint is currently due on April 23, 2013. The NFL Defendants seek an extension of this deadline to May 23, 2013. The NFL Defendants and Plaintiff previously stipulated to a ten-day extension of this deadline in state court—to the deadline for the NFL Defendants to remove the action to federal court, and to a sixty-day extension of this deadline in federal court during which the parties briefed the pending remand and stay motions before the Court.

In sum, with Plaintiff's consent, the NFL Defendants request a 30-day extension to May 23, 2013 to answer, move, or otherwise respond to the complaint.

We appreciate the Court's attention to this matter.

Respectfully submitted,

*Brad S. Karp* (DB)

Brad S. Karp

cc (via e-mail): Gene Locks, Esq.  
Andrew P. Bell, Esq.  
David D. Langfitt, Esq.

*Counsel for Plaintiff*

**Application GRANTED**  
**SO Ordered**

4/22/13

*K. B. Forrest*

HON. KATHERINE B. FORREST  
UNITED STATES DISTRICT JUDGE

<sup>1</sup> The JPML has noticed Plaintiff's motion to vacate the JPML's Conditional Transfer Order for this action for hearing, without oral argument, on May 30, 2013. (See MDL 2323, ECF Dkt. No. 354.)